

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

RAMON ARAGON, *et al.*,  
Defendants.

69cv07941 BB-ACE

RIO CHAMA STREAM SYSTEM

**MOTION FOR EXTENSION OF TIME**

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer (“State”) and respectfully requests the Court to grant an extension of time to file a joint status report and proposed scheduling order as required by the Order (7472) filed June 15, 2004.

1. The Court’s June 15 Order (7472) requires that no later than July 9, 2004, counsel for the State and the Acequias shall confer and file a joint status report on the progress of activities outlined in the Court’s June 24, 2003 Order Adopting Schedule for Completion and Exchange of Historical Reports (7169).

2. Counsel for the Acequias in Sections 4 and 5, Mary E. Humphrey, is unavailable and will not return to her office until June 28, 2004.

3. Counsel for the State has discussed the Court’s June 15 Order with Counsel for the Acequias in Sections 3 and 7, John Utton, but the State has not yet received any specific information concerning the Acequias’ proposed schedule for completion of the Acequias’ historical reports for Sections 3 and 7.

4. Counsel for the State will be unavailable from June 23, 2004 to July 12, 2004. *See*

*Notice of Unavailability* (7473) filed June 16, 2004.

WHEREFORE Counsel for the State of New Mexico respectfully requests that the Court grant an extension of time until August 2, 2004, for the State and the Acequias to confer and file a joint status report and proposed scheduling order as required by the June 15, 2004 Order (7472).

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 827-6150

#### CERTIFICATE OF SERVICE

I hereby certify that copies of the above pleading were mailed to following persons on June 22, 2004.

/s/ Ed Newville  
Edward G. Newville

#### RIO CHAMA GENERAL SERVICE LIST

Special Master Vickie L. Gabin USDC-DCNM P.O. Box 2384 Santa Fe, NM 87504-2384	Mary E. Humphrey, Esq. P.O. 1574 El Prado, N.M. 87529-1574	P.O. Box 5333 Santa Fe, NM 87502-5333
Karla McCall, Data Manager. 1315 Sagebrush Dr. SW Los Lunas, NM 87031	John W. Utton, Esq. Sheehan, Sheehan & Stelzner PA P.O. Box 271 Albuquerque, NM 87103-0271	Annie Laurie Coogan, Esq. 1520 Paseo de Peralta # E Santa Fe, NM 87501-3722
Bradley S. Bridgewater, Esq. David W. Gehlert, Esq. USDOJ-ENRD 999 18th St., Suite 945 Denver, CO 80202	Fred J. Waltz, Esq. P.O. Box 6390 Taos, NM 87571	John E. Farrow, Esq. Farrow, Farrow & Stroz P.O. Box 35400 Albuquerque, NM 87176
	Frank M. Bond, Esq. The Simmons Firm LLP	Randolph B. Felker, Esq. Felker, Ish, Hatcher, Ritchie, Sullivan & Geer

911 Old Pecos Trail Santa Fe, NM 87501	Rebecca Dempsey, Esq. White, Koch, Kelly & McCarthy PA P.O. Box 787 Santa Fe, NM 87504-0787	P.O. Drawer 1508 Santa Fe, NM 87504-1508
K. Janelle Haught, Esq. NMHSTD P.O. Box 2348 Albuquerque, NM 87504-2348	Lester K. Taylor, Esq. Susan G. Jordan, Esq. Nordhaus, Haltom, Taylor, Taradash & Bladh, LLP 405 Martin Luther King Ave NE Albuquerque, NM 87102-3541	
Mary Ann Joca, Esq. U.S. Department of Agriculture Office of General Counsel P.O. Box 586 Albuquerque, NM 87102	Tessa T. Davidson, Esq. Swain, Schrandt & Davidson, PC 4830 Juan Tabo, NE, Suite F Albuquerque, NM 87111	
Randy E. Lovato, Esq. 8100 Rancho Sueno Ct., NW Albuquerque, NM 87120	Marcus J. Rael, Jr. Esq. French & Associates, PC 500 Marquette Ave. NW Albuquerque, NM 87120	
Steven L. Bunch, Esq. NMSHTD P.O. Box 1149 Santa Fe, NM 87504-1149	Ted J. Trujillo, Esq. P.O. Box 2185 Española, NM 87532	
Peter B. Shoenfeld, Esq. P.O. Box 2421 Santa Fe, NM 87504-2421	Pierre Levy, Esq. Law Offices of Daniel J. O'Friel Ltd. P.O. Box 2084 Santa Fe, NM 87504-2084	
Lucas O. Trujillo P.O. Box 57 El Rito, NM 87530	John P. Hays, Esq. Cassutt, Hays, & Friedman PA 530-B Harkle Road Santa Fe, NM 87505	
Fred Vigil P.O. Box 687 Medanales, NM 87548	Charles T. DuMars, Esq. Law & Resource Planning Assoc. 201 Third Street, NW #1370 Albuquerque, NM 87102	
C. Mott Wooley, Esq. 112 W. San Francisco St. Suite 312C Santa Fe, NM 87501-2090	Daniel Cleavenger, Esq. P.O. Box 2470 Farmington, NM 87499	
Jeffrey L. Fornaciari, Esq. Hinkle, Cox, Eaton, Coffield & Hensley P.O. Box 2068 Santa Fe, NM 87504-2068	Joseph V. R. Clark, Esq. Cudy, Kennedy, Hetherington, Alberta & Ives LLP P.O. Box 4160 Santa Fe, NM 87502-4160	
Paula Garcia NM Acequia Association 430 W. Manhattan, Ste. 5 Santa Fe, NM 87501	Christopher D. Coppin, Esq. NM Attorney General's Office	
Benjamin Philips, Esq. John F. McCarthy, Jr., Esq.		

Martin E. Threet, Esq.  
Martin E. Threet and Associates  
6400 Uptown Blvd. NE Suite 500W  
Albuquerque, NM 87110

Kurt J. Van Deren  
Hatch, Allen & Shepherd PA  
PO Box 30488  
Albuquerque, NM 87190-0488

Liliosa G. Padilla  
432 Parkland Dr.  
Aztec, NM 87410

Alfonso G. Sanchez, Esq.  
2853 Calle Princesa Juana  
Santa Fe, NM 87507

Karen L. Townsend, P.C.  
120 East Chaco  
Aztec, NM 87410

NM Acequia Commission  
Fred Vigil, Chairman  
Depart. of Finance & Admin.  
Local Government Division  
Bataan Memorial Building  
Santa Fe, NM 87503

David Mielke, Esq.  
Sonosky, Chambers, Sachse,  
Endersen & Mielke, LLP  
500 Marquette Ave. #700  
Albuquerque, NM 87102